

**L.B.F. 9014-3**

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION**

<b>In re:</b>	<b>:</b>	<b>Chapter 13</b>
	<b>:</b>	
<b>Robert S. Stimpfle,</b>	<b>:</b>	
	<b>:</b>	
	<b>:</b>	<b>Bky. No. 21-10097-pmm</b>
	<b>:</b>	
<b>Debtor</b>	<b>:</b>	

\* \* \* \* \*

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Movant, NewRez LLC d/b/a Shellpoint Mortgage Servicing, has filed a Motion to Approve Loan Modification with the court for approval of the Loan Modification Agreement.

1. **Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney).**
2. **If you do not want the court to grant the relief sought in the Motion or if you want the court to consider your views on the Motion, then on or before May 25, 2023 you or your attorney must file a response to the Motion.**
3. **A hearing on the Motion is scheduled to be held on June 8, 2023, at 11:00 A.M. before **Judge Patricia M. Mayer** at the United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Suite 103, 4<sup>th</sup> Floor, Reading, PA 19601.**
4. **If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.**
5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed a response.
6. If a copy of the motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney whose name and address is listed on the next page of this Notice.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at

United States Bankruptcy Court  
Eastern District of Pennsylvania  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601

9. **If you mail your response** to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Charles Wohlrab, Esquire  
Robertson, Anschutz, Schneid, Crane & Partners PLLC  
13010 Morris Road, Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
Fax: 404-393-1425  
Email: [cwohlrab@raslg.com](mailto:cwohlrab@raslg.com)

Dated: May 10, 2023

**Robertson, Anschutz, Schneid, Crane & Partners PLLC**  
Attorney for Secured Creditor  
13010 Morris Road, Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
Fax: 404-393-1425  
By: /s/ Charles G. Wohlrab  
Charles Wohlrab, Esquire  
Bar ID: 314532  
Email: [cwohlrab@raslg.com](mailto:cwohlrab@raslg.com)

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	:	<b>Bky. No. 21-10097-pmm</b>
	:	
<b>Debtor</b>	:	

**CERTIFICATE OF SERVICE**

I, the undersigned, certify that on May 10, 2023 I caused copies of the Notice of Hearing on Motion to Approve Loan Modification to be served upon the following by first class U.S. Mail, postage prepaid or electronic mail, at the following addresses:

Robert S. Stimpfle  
2775 Destiny Lane  
Easton, PA 18040

Charles Laputka  
Laputka Law Office  
1344 W. Hamilton Street  
Allentown, PA 18102

Scott F. Waterman, Esq.  
Chapter 13 Trustee  
2901 St. Lawrence Ave., Suite 100  
Reading, PA 19606

U.S. Trustee  
United States Trustee  
Office of the U.S. Trustee  
900 Market Street, Suite 320  
Philadelphia, PA 19107

Dated: May 10, 2023

**Robertson, Anschutz, Schneid, Crane & Partners PLLC**

Attorney for Secured Creditor  
13010 Morris Road, Suite 450  
Alpharetta, GA 30004  
Telephone: 470-321-7112  
Fax: 404-393-1425  
By: /s/ Charles G. Wohlrab  
Charles Wohlrab, Esquire  
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